

EXHIBIT AAD

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
--	--

This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-1923
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

**DECLARATION OF DR. ABDUL WAHAB NOORWALI IN SUPPORT OF
DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH**

I, Dr. Abdul Wahab Noorwali, declare that the following statements are true and correct under penalty of perjury:

1. I am not a party in the above captioned matter.
2. I am a citizen of Saudi Arabia.
3. I was born on December 6, 1953 in Jeddah, Kingdom of Saudi Arabia.
4. I have a Baccalaureate degree in Pharmacy and a Ph.D. in Clinical Biochemistry from the University of Sheffield in 1982.
5. I am currently employed as a Professor at King Abdul Aziz University Medical School in Jeddah, Saudi Arabia. I started teaching there after graduating in 1982 and have been teaching Clinical Biochemistry for the past 33 years. I give six lectures per week on Proteins and Endocrinology.



on the condition that LBI would follow WAMY policies and protocols. This occurred prior to the Government of Afghanistan assuming control of the hospital operations from WAMY.

30. LBI undertook fundraising activities on its own to support its projects. WAMY was not involved in any LBI fundraising or daily operations, but it did financially support projects completed by LBI under the auspices of WAMY until the relationship between LBI and WAMY ended.
31. The WAMY Pakistan office eventually took over all of LBI's projects. The purpose and goal of LBI's work was to provide assistance and support programs for the needy in the areas of social welfare, orphanage establishment and support, schools and educational programs, hospitals and primary health care, University scholarships, technical and vocational training programs, and special education programs.
32. Adel Batterjee was initially retained by WAMY to continue daily operations of LBI's former projects. He was very resourceful. At that time, his projects were successful.
33. During this time, WAMY engaged in mainly educational activities and development projects in Afghanistan.
34. Over time, as WAMY's relationship with Adel Batterjee and LBI progressed, WAMY had some financial, administrative and report delivering disagreements with Adel Batterjee. WAMY is very strict with regards to reporting. Field visits must be conducted during an activity, and a project report must be issued whenever an activity or program is completed.
35. Mr. Batterjee often disregarded these procedures and was not very clear with the operations he conducted. There was lack of clarity with what he was doing and a lack

of reporting to confirm operations (i.e. ambiguity in receivables and expenditures). He routinely started to give the Board incomplete evidence of projects performed or would only report on activities after the fact.

36. Mr. Batterjee also wanted to conduct all of LBI's operations alone and did not want a support team from WAMY. He had a financial management team, but would not cooperate with the team and never spoke to me about finances. Batterjee was determined to be a one man show.
37. In addition to Mr. Baharith, who introduced Adel Batterjee to Dr. Al Johani, Mr. Shahir Batterjee was a board member of LBI. Both individuals did not agree with Adel Batterjee's operation and management of programs in Pakistan and Afghanistan.
38. Mr. Batterjee also attempted to raise money for LBI at mosques during Friday prayers without WAMY's permission, which is against WAMY and government policy. WAMY was reprimanded by the Kingdom of Saudi Arabia as a result.
39. WAMY did not agree with the way Adel Batterjee was operating the LBI projects which WAMY took over and was concerned at his lack of transparency, and so it was decided that he should be dismissed.
40. Around the time of Mr. Batterjee's termination in 1993, WAMY became aware that Adel Batterjee had started an organization named Monathammat El Birr A Doualia known as Benevolence International Foundation ("BIF"). WAMY sent him a letter on February 26, 1993 advising him that it was inappropriate for him to start this organization with a similar name to confuse people. Donors may be confused and think that BIF is affiliated with LBI (Benevolence Islamic Committee), as the names